

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**IN RE: INTERIOR MOLDED DOORS
ANTITRUST LITIGATION**

Lead Civil Action No. 3:18-cv-00718-JAG

**DIRECT PURCHASER PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL OF REVISED SETTLEMENT**

Direct Purchaser Plaintiffs Grubb Lumber Co., Inc. and Philadelphia Reserve Supply Company (“Plaintiffs”) respectfully move the Court for an Order: (i) granting preliminary approval of the proposed revised settlement (“Revised Settlement”) reached between Plaintiffs and Defendants JELD-WEN, Inc. and Masonite Corporation; (ii) conditionally certifying the Settlement Class¹ solely for the purposes of this Settlement, and appointing Plaintiffs as representatives of the Settlement Class, and Boni, Zack & Snyder LLC and Spector Roseman & Kodroff, P.C. as Co-Lead Counsel for the Settlement Class; (iii) approving the proposed form and manner of giving notice of the Revised Settlement to the Settlement Class; (iv) approving Plaintiffs’ choice of a Claims Administrator and Escrow Agent; (v) preliminarily approving Plaintiffs’ proposed plan of distribution; and (vi) setting a hearing date for final approval of the Revised Settlement and a schedule for various deadlines relevant thereto, and for such other and further relief as the Court may deem appropriate.

¹ The Settlement Class is defined as “All persons or entities that bought interior molded doors in the United States from and including October 19, 2014, to and including December 31, 2018 directly from either Defendant.” Excluded from the Settlement Class are Defendants, their parent companies, subsidiaries and affiliates, and federal governmental entities and instrumentalities of the federal government and any judicial officer presiding over this action, and any member of his or her immediate family and judicial staff.

Submitted herewith in support of this motion are the: (i) Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Revised Settlement; (ii) Declaration of Michael J. Boni in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Revised Settlement and Exhibits thereto; and (iii) [Proposed] Order Granting Preliminary Settlement Approval.

Dated: January 29, 2021

/s/ Wyatt B. Durrette, Jr.

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Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically e-mail notification of such filing to all counsel of record.

To the best of my knowledge, there are no other attorneys or parties who require service by U.S. Mail.

/s/ Wyatt B. Durrette, Jr.

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